

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----:  
GREAT WESTERN INSURANCE CO., :

Plaintiff, :

v. :

MARK GRAHAM, *et al.*, :

Defendants. :  
-----:

Civil action no. 1:18-cv-06249  
VSB-SN

**DECLARATION OF EDWARD BRENDAN LYNCH IN SUPPORT OF JOINT MOTION  
TO DISMISS BY DEFENDANTS JOHN DRAKE AND EDWARD BRENDAN LYNCH**

EDWARD BRENDAN LYNCH hereby declares as follows, pursuant to 28 U.S.C. §  
1746:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this declaration. The facts set forth in this declaration are within my personal knowledge. I make this declaration in support of a joint motion with John Drake to dismiss the amended complaint for lack of personal jurisdiction.

2. From approximately 11 February, 2011, until approximately 31 December, 2017, I served as one of the outside directors of Alpha Re Ltd.

3. During my entire tenure as a director of Alpha Re Ltd., I resided outside the United States – in the Bahamas.

4. I never personally attended an Alpha Re Ltd. board meeting in New York (or anywhere else). Instead, I participated in board meetings telephonically, usually dialing in from the Bahamas. While it is possible that I dialed in to a board meeting from other locations around

the world, I am certain I never was physically present at a board meeting, in person, in New York (or anywhere else).


5. I have never entered New York to conduct business of any kind on behalf of Alpha Re Ltd., any entity affiliated with Alpha Re Ltd., or any other entity named as a defendant in the above-captioned lawsuit. Indeed, I have never: (a) transacted business of any kind in New York, (b) had any employees in New York, or (c) solicited business from any person or company located in New York.

6. I do not now, nor have I ever, had property of any kind located in New York. I have not owned, used, leased, rented or possessed any real property in New York. I have not maintained any bank accounts in New York.

7. The last time I was present in New York was in or about September, 2013, to attend a sporting event (and *not* in connection with the transaction of business).

8. I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 19, 2018



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EDWARD BRENDAN LYNCH